impeachment may not be used when the witness is a non-expert, *Loring* v. *Warren County,* 1 Ky. L. Rep. 340; *People* v. *Patrick,* 182 N. Y. 131, but that it is admissible when he is a handwriting expert, *Browning* v. *Gosnell,* 91 Ia. 448; *Hoag* v. *Wright,* 174 N. Y. 36. Still others hold that it is inadmissible in either case, basing their holding upon the ground that comparisons may be made only with admittedly genuine signatures upon direct examination, and that the same rule is applicable to cross-examination. *Gaunt* v. *Harkness,* 53 Kan. 405; *Fourth National Bank of Fayetteville* v. *McArthur,* 84 S. E. 39; ROGERS, EXPERT TESTIMONY (2d ed.) p. 342, § 144. In the light of the various views which different courts have taken of the subject, it is difficult to determine where the weight of authority lies, but reason and expediency would seem to be with those courts which permit the handwriting expert so to be impeached, and against the holding in the principal case. *Hoag* v. *Wright,* 174 N. Y. 36.

GIFTS—EXPECTANT ESTATE IN PERSONALTY.—Where the owner of shares of stock gives a certificate for a number of these shares to a third person, with instructions to deliver the same to his daughter, only in case of his death, *held,* that such transaction creates an expectant estate in personal property. *Innes* v. *Potter* (Minn. 1915) 153 N. W. 604.

Under § 3213 of MINN. REV. ST. 1905, authorizing a freehold estate as well as chattels real to be created commencing at a future day, deeds of real estate granted in the manner of the principal case have long been held to vest complete title in the grantee after the death of the grantor. *Haeg* v. *Haeg,* 53 Minn. 33, 35 N. W. 114; *Wicklund* v. *Lindquist,* 102 Minn. 34, 113 N. W. 631; *Dickson* v. *Miller,* 124 Minn. 346, 145 N. W. 112. In early times expectant estates in personalty were unknown because of such property's changeability and comparative insignificance. But the present trend of development, both in England and the United States, is toward a general recognition of future estates in personalty with an evident disregard for all prior imposed limitations and restrictions, the estate being held good whether made by will or by deed and whether the goods or merely the use of the goods be given to the first legatee. 2 KENT, COM. (13th Ed.) 352, 353 and notes: *Longworthy* v. *Chadwick,* 13 Conn. 42. The principal case brings Minnesota into accord with what seems to be the settled law of most jurisdictions: namely, that the donor may create a valid expectant estate in personalty, by gift made absolute by delivery to some third person, the right of enjoyment in the donee being postponed until after the death of the donor. *Grand Trust and Savings Co.* v. *Tucker,* 49 Ind. App. 345, 96 N. E. 487; *Tucker* v. *Tucker,* 138 Iowa 344, 116 N. W. 119; *Meriwether* v. *Morrison,* 78 Ky. 572; *Greene* v. *Tulane,* 52 N. J. Eq. 169, 28 Atl. 9.

HUSBAND AND WIFE—ALIENATION OF AFFECTIONS—LIABILITY OF RELATIVES. —The defendants who were the parents, brothers and sisters of the plaintiff's wife made threats upon the life of the plaintiff and informed his wife that she "must choose between them and him," wherefore the plaintiff's wife was induced to abandon him. Plaintiff was unobjectionable as a husband, and the only apparent reason for the interference by the relatives was the fact that